

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**ANGEL D DELGADO SAN MIGUEL**

**DEBTOR(S)**

**CASE NUMBER: 13-06624 MCF**

**CHAPTER 13**

**MOTION REQUESTING ORDER  
AND WRIT FOR CANCELLATION OF JUDICIAL LIEN**

**TO THE HONORABLE COURT:**

**COME(S) NOW DEBTOR(S)**, represented by the undersign counsel and respectfully **ALLEGE(S)** and **PRAY(S)** as follows:

1. On September 16<sup>th</sup> of 2014, this Honorable Court entered a Judgment granting debtor's Adversary Proceeding # 13-00227 to Avoid Judicial Lien held in favor of **ASSOCIATES INTERNATIONAL HOLDINGS d/b/a GENERAL ELECTRICAL CAPITAL** pursuant 11 U.S.C. §1322(b)(2). Docket # 31)
2. Debtor requests this Honorable Court to issue an order directing the Registrar of the Property for Section IV of the Bayamom Property Registry to cancel the Judicial Lien encumbering Debtor's residential property. A proposed order and a proposed writ of cancellation of lien are attached to this motion.

**WHEREFORE**, Debtor hereby prays from this Honorable Court to grant the present Motion and issue an order directing the Registrar of the Property for the Section IV of the Bayamon Property Registry to cancel the judicial lien over debtor's residential property and authorize the Clerk of the Court to issue a writ of assistance containing the aforementioned order, for the corresponding cancellation of the judicial lien at the Property Registry.

**I HEREBY CERTIFY:** that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to United States Trustee, Mr. Jose Carrion, Chapter 13 Trustee, and we sent copy of this document through regular mail to Debtor(s) and all non-CM/ECF participant interested parties to their address listed on the master address list.

**IN SAN JUAN, PUERTO RICO**, this 29<sup>th</sup> day of September of 2018.

**/s/LUIS J CUEVAS FONTAN**

**ATTORNEY FOR DEBTOR**

**USDC PR 226806**

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FOR THE DISTRICT OF PUERTO RICO

IN RE:

ANGEL D DELGADO SAN MIGUEL

DEBTOR(S)

CASE NUMBER: 13-06624 MCF

CHAPTER 13

**PROPOSED ORDER**

Upon consideration of Debtor's "Motion Requesting Order and Writ for Cancellation of Judicial Lien", the Registrar of the Property of Bayamon, Section IV, is hereby ORDERED to cancel the below listed lien which encumbers the following property:

"URBANA: Solar radicado en la Urbanización Estancias de Tortuguero, localizado en el Barrio Algarrobo del término municipal de Vega Baja, Puerto Rico, que se describe en el plano de inscripción de la urbanización con el número, área y colindancias que se relacionan a continuación: Solar número 2 del bloque "B", área del Solar 1,338.38 metros cuadrados. En lindes por el NORTE, con el Lote número 1 en una distancia de 50.60 metros; por el SUR, con el Lote número 3 en una distancia de 56.07 metros; por el ESTE con la Calle número 1, en una distancia de 25.00 metros y por el OESTE con los lotes números 3 y 2 del Bloque "C", en una distancia de 25.29 metros.

Contiene un estructura de concreto a ser destinada a vivienda"

The above described property is registered at the Vega Baja volume 314, sheet # 81, Property #25,419 at the Property Registry of Bayamon, Section IV. The above described property is subject to the following lien and encumbrance which is hereby ordered to be cancelled:

"Al asiento 372 del diario 281, el dia 11 de febrero de 2013, se presenta Embargo de fecha 10 de octubre de 2012, seguido en el Tribunal de Primera Instancia de Puerto Rico, Sala de Bayamon, en el Caso Civil numero DCD2009-1926, por Associates International Holdings, por la suma de \$72,698.09"

**IT IS SO ORDERED** that a Writ of Cancellation be issued by the Clerk of this Court, whereby the Registrar of the Property for the Fourth Section of Bayamon shall be instructed to cancel the above described lien, which encumbers the property described herein.

**SO ORDERED.**

**IN SAN JUAN, PUERTO RICO,** \_\_\_\_\_.

\_\_\_\_\_  
HON. MILDRED CABAN FLORES  
U.S. Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**ANGEL D DELGADO SAN MIGUEL**

**DEBTOR(S)**

**CASE NUMBER: 13-06624 MCF**

**CHAPTER 13**

**PROPOSED WRIT OF CANCELLATION OF LIEN**

TO THE HONORABLE PROPERTY REGISTRAR,  
BAYAMON PROPERTY REGISTRY  
FOURTH SECTION:

WHEREAS, the Honorable Mildred Caban Flores has issued an order in this case dated \_\_\_\_\_, which literally reads as follows:

Upon consideration of Debtor's "Motion Requesting Order and Writ for Cancellation of Judicial Lien", the Registrar of the Property of Bayamon, Section IV, is hereby ORDERED to cancel the below listed lien which encumbers the following property:

"URBANA: Solar radicado en la Urbanización Estancias de Tortuguero, localizado en el Barrio Algarrobo del término municipal de Vega Baja, Puerto Rico, que se describe en el plano de inscripción de la urbanización con el número, área y colindancias que se relacionan a continuación: Solar número 2 del bloque "B", área del Solar 1,338.38 metros cuadrados. En lindes por el NORTE, con el Lote número 1 en una distancia de 50.60 metros; por el SUR, con el Lote número 3 en una distancia de 56.07 metros; por el ESTE con la Calle número 1, en una distancia de 25.00 metros y por el OESTE con los lotes números 3 y 2 del Bloque "C", en una distancia de 25.29 metros.

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**IT IS SO ORDERED** that a Writ of Cancellation be issued by the Clerk of this Court, whereby the Registrar of the Property for the Fourth Section of Bayamon shall be instructed to cancel the above described lien, which encumbers the property described herein.

**SO ORDERED.**

**IN SAN JUAN, PUERTO RICO,** \_\_\_\_\_.

(Signed)  
HON. MILDRED CABAN FLORES  
U.S. Bankruptcy Judge

**WHEREFORE**, by the way of the present Writ of Cancellation of Lien, you, as Registrar of the Property of Bayamon, Section IV, and in compliance with the order copied above, are hereby **ORDERED** to proceed with the cancellation of the lien described in the above transcribed order which encumbers the property described in it.

**IN TESTIMONY OF WHICH**, I issue the present writ under my signature and the Seal of this Court.

**IN SAN JUAN, PUERTO RICO**, this \_\_\_\_\_.

\_\_\_\_\_  
MARIA DE LOS ANGELES GONZALES  
CLERK OF THE U.S. BANKRUPTCY  
COURT, DISTRICT OF PUERTO RICO

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